

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

ALLIANCE FOR AUTOMOTIVE
INNOVATION

Plaintiff,

vs.

MAURA HEALEY, ATTORNEY GENERAL
OF THE COMMONWEALTH OF
MASSACHUSETTS in her official capacity,

Defendant.

C.A. No. 1:20-cv-12090-DPW

JOINT MOTION TO ACCEPT POST-TRIAL FILINGS UNDER SEAL

Pursuant to Local Rule 7.2 and Paragraph 10 of the Confidentiality Protective Order, Plaintiff Alliance for Automotive Innovation (“Plaintiff” or “Auto Innovators”) and Defendant, Maura Healey, in her official capacity as Attorney General of the Commonwealth of Massachusetts (“Defendant” or “Attorney General”) (collectively the “Parties”) submit this Joint Motion to respectfully request that the Court accept for filing under seal: (a) those portions of the parties’ post-trial submissions, including their revised and supplemental proposed findings of fact, due on July 14, 2021 which reflect information that Plaintiff still maintains is confidential or highly confidential under the Confidentiality Protective Order; and (b) Plaintiff’s post-trial notice regarding confidentiality designations and the supporting affidavits in connection with the same.

The latter filing identifies the limited information in the trial record which Plaintiff still maintains is confidential or highly confidential, and the supporting affidavits provide the specific support for Plaintiff’s remaining confidentiality designations. Plaintiff asserts that both Auto Innovators and its members would suffer harm if Plaintiff is not permitted to make these filings under seal, particularly given that the purpose of the latter set of filings is to allow the Court to

assess, and rule upon, the remaining confidentiality designations. For the same reason, the post-trial filings of both parties which reflect that information should be filed under seal until the Court has the opportunity to adjudicate the remaining confidentiality designations.

The parties will electronically file redacted, public versions of the foregoing documents at the time they make their filings under seal. Accordingly, parties respectfully request that the Court grant this Motion to Accept Post-Trial Filings Under Seal.

Dated: July 13, 2021

Respectfully submitted,

PLAINTIFF ALLIANCE FOR
AUTOMOTIVE INNOVATION

By its attorneys,

/s/Laurence A. Schoen

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CERTIFICATE OF SERVICE

I hereby certify that this document, filed through the ECF system, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and that paper copies will be sent to those indicated as non-registered participants on July 13, 2021.

/s/ Laurence A. Schoen
Laurence A. Schoen